

1. Movant requests leave to file a supplemental appendix to the Motion for the sole purpose of submitting the Declaration of Robert Summers (“Summers Declaration”), which relates solely to the hours invested by Taube Summers Harrison Taylor Meinzer Brown LLP f/k/a Hohmann, Taube & Summers LLP (“TS”) when TS was lead counsel to Movant in the BDO Litigation. The proposed Supplemental Appendix is attached hereto as **Exhibit A**.

2. The Summers Declaration is being submitted now, because Movant’s counsel only recently resolved the TS Objection [Dkt. #2208] to the Motion, and TS agreed to provide the Declaration following resolution of the TS Objection. The TS Objection was withdrawn on August 25, 2015 [*See* Dkt. #2223], and Movant filed the Supplemental Appendix with the Summers Declaration on August 26, 2015 [Dkt #2224].

3. The clerk contact Movant’s counsel this morning indicating a Motion for Leave to File the Supplemental Appendix should be submitted. No party is being prejudiced by the submission of the Summers Declaration at this time, as it merely established the billable hours invested by TS as former lead counsel to Movant for the Court’s consideration in connection with Movant’s request for approval of Movant’s attorneys’ fees.

PRAYER

Movant respectfully request that the Court grant this motion for leave and enter the attached order permitting Movant to file the Supplemental Appendix attached hereto as **Exhibit A**, and already filed as Dkt. #2224 in Civil Action No. 3:09-CV-0298-N.

Dated: August 27, 2015

Respectfully submitted,

/s/ Douglas J. Buncher

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**ATTORNEYS FOR THE OFFICIAL STANFORD
INVESTORS COMMITTEE**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record via this Court's ECF system on August 27, 2015.

/s/ Douglas J. Buncher

Douglas J. Buncher

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff

v.

CIVIL ACTION NO. 3:09-CV-0298-N

**STANFORD INTERNATIONAL BANK,
LTD., et al.,**

Defendants.

**THE OFFICIAL STANFORD
INVESTORS' COMMITTEE,**

Plaintiff,

V.

CIVIL ACTION NO. 3:12-CV-01447-N

BDO USA, LLP, et al.

Defendants.

**SUPPLEMENTAL APPENDIX IN SUPPORT OF EXPEDITED REQUEST FOR ENTRY
OF SCHEDULING ORDER AND MOTION TO APPROVE PROPOSED SETTLEMENT
WITH BDO USA, LLP TO APPROVE THE PROPOSED NOTICE OF SETTLEMENT
WITH BDO USA, LLC, TO ENTER THE BAR ORDER, TO ENTER THE FINAL
JUDGMENT AND BAR ORDER, AND FOR PLAINTIFFS' ATTORNEYS' FEES**

Ralph S. Janvey, (the “Receiver”), and the Official Stanford Investors Committee (“OSIC”), file this supplement to the appendix filed on May 15, 2015 [Dkt. #2138] in support of the *Expedited Request for Entry of Scheduling Order and Motion to Approve Proposed Settlement with BDO USA, LLP to Approve the Proposed Notice of Settlement with BDO USA, LLC, to Enter the Bar Order, to Enter the Final Judgment and Bar Order, and for Plaintiffs’ Attorneys’ Fees* [Dkt. #2137].

EXHIBIT	DESCRIPTION	APP. NOS.
7	Declaration of Robert Summers	0287-0288

Dated: August 26, 2015

Respectfully submitted,

/s/ Douglas J. Buncher

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INVESTORS COMMITTEE**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record via this Court's ECF system on August 26, 2015.

/s/ Douglas J. Buncher

Douglas J. Buncher

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff

v.

STANFORD INTERNATIONAL BANK,
LTD., ET AL.,

Defendants.

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Cause No. 3:09-CV-0298-N

**DECLARATION OF ROBERT SUMMERS IN SUPPORT OF MOTION TO
APPROVE PROPOSED SETTLEMENT AGREEMENT WITH BDO ENTITIES**

1. My name is Robert Summers. I am over 18 years of age and am fully competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration and they are all true and correct.

2. I am a partner of Taube Summers Harrison Taylor Meinzer Brown LLP f/k/a Hohmann, Taube & Summers LLP ("TS"). TS served as lead counsel for the Official Stanford Investors Committee ("OSIC") in Civil Action No. 3:12-CV-01447-N, *Official Stanford Investors Committee v. BDO USA, LLP, et al.* (the "OSIC Litigation") from March 2011 until August 22, 2013. During this time period, TS incurred \$453,609.25 in professional fees, which represents a total of 1,519.65 hours of time spent by TS professionals at a blended hourly rate of \$298.50.

3. TS also served as lead counsel to the Investor Plaintiffs in Civil Action No. 3:11-CV-01115-N, *Phillip Wilkinson, et al. v. BDO USA, LLP, et al.* (the "Investor Litigation") (together with the OSIC Litigation, the "BDO Litigation") from January 2011 until September

Declaration of Robert Summers

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25, 2013. During this time period, TS incurred \$892,177.00 in professional fees, which represents a total of 2,955.30 hours of time by TS professionals at a blended hourly rate of \$301.89.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 25, 2015.



Robert Summers

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